UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMEI	RICA,	§	
		§	Criminal No. 4:24-cr-00298
V •		§	
		§	
EITHAN DAVID HAIM		§	
		§	
I	Defendant.	§	

JOINT UNOPPPOSED MOTION FON ENTRY OF AN AGREED ORDER MODIFYING PROTECTIVE ORDER

The parties move to modify the Court's Discovery Protective Order (ECF 63), issued on September 27, 2024. Dr. Haim seeks to have his civil attorneys review and potentially use the discovery material in future civil claims against various parties stemming from the criminal charges that the United States brought against him under the previous administration.

A proposed order setting forth the agreed modification is attached for the Court's consideration.

Respectfully submitted,

NICHOLAS J. GANJEI United States Attorney

By: s/ Daniel D. Hu

> Daniel D. Hu **Assistant United States Attorney** State Bar No. 10131415 S.D. I.D. 7959 Southern District of Texas 1000 Louisiana, Suite 2300 Houston, TX 77002 (713) 567-9518 (PHONE) (713) 718-3303 (FAX)

Email: Daniel.Hu@usdoj.gov

Attorney for the United States

/s Mark D. Lytle by permission Mark D. Lytle DC Bar 1765392 SDTX No. 3884197 Nixon Peabody LLP

799 9th Street NW, Suite 500 Washington, D.C. 20001

Tel: 202.585.8435 Fax: 202.585.8080

mlytle@nixonpeabody.com

Attorneys for Eithan David Haim

CERTIFICATE OF SERVICE

I certify that on July 22, 2025, the foregoing was filed and served on counsel of record through the Court's CM/ECF system.

/s/ Daniel D. Hu

Daniel D. Hu Assistant United States Attorney